Applicant : Kurzweil, et al.
Serial No. : 09/703,828
Filed : November 1, 2000
Page : 9 of 12

Att⬤y's Docket No.: 11327-008001

REMARKS

Claims 1 to 32 are pending in this application of which claims 1, 3, 11, 23 and 27 are the independent claims. Favorable reconsideration and further examination are respectfully requested.

Initially, claims 8, 9, 13, 14, 15 and 18 to 21 were rejected under 35 U.S.C. § 112, second paragraph.

In claim 8, the Examiner indicates that there is no antecedent basis for "the poet personalities." Accordingly, Applicants have amended claim 8 to depend on claim 7.

In claim 9, the Examiner indicates that there is no antecedent basis for term "the order". Accordingly, Applicants have amended claim 9 to depend on claim 8.

In claims 13 and 19, the Examiner indicates that there is no antecedent basis for the terms "the user input word" and "the link structure." Accordingly, Applicants have amended "the user input word" to be "a user input word" and have amended "the link structure" to be "the linked data structure".

In claims 14, 15 and 21, the Examiner indicated that there is no antecedent basis for "the data structures." Accordingly, Applicants have amended the term "the data structures" to "the linked data structure."

Further, in regards to claims 15 and 21, there is no antecedent basis for "the pre-existing compositions" and "the analyzed composition". Accordingly, Applicants have amended "the pre-existing compositions" to "pre-existing compositions" and have amended "the analyzed composition" to "an analyzed composition."

The Examiner has also objected to claims 15 and 21 because the phrases "while examine weights" and "tend to repeat same words" are unclear. The phrase "while examine weight" was amended to the phrase "while examining weights" and the phrase "tend to repeat same words" was amended to the phrase "tend to repeat identical words."

The examiner rejected claims 1 to 4, 6 to15, 17 to 23, 25 to 30 and 32 (in the summary, the examiner states claims 1 to 4 and 6 to 10) under 35 U.S.C. § 103 over "The Angelic Beat

Applicant : Kurzweil, et al.
Serial No. : 09/703,828
Filed : November 1, 2000
Page : 10 of 12

Attorney's Docket No.: 11327-008001

Haiku Machine" by Zasa in view of 'How to Use Micrsoft Windows NT Workstation"Gavron et al. ("Gavron"); and also rejected claims 5, 16, 24 and 31 under 35 U.S.C. § 103 over "Zasa in view of Gavron and further in view of Straub. Claim 1 recites loading an author analysis model and randomly selecting a seed word from the author analysis model. These features of claim 1 are not suggested by these references since Zasa does not describe or suggest an author analysis model. The Zasa reference dos not disclose templates or a universe of words, nor an author analysis model as used by Applicant in the claims and specification as contended by the examiner. On the contrary, the reference does not disclose any features of the Haiku Machine. Rather, the examiner's assertions of what the reference does disclose or what one would consequently understand from this paper clearly underscores the deficiencies in the teachings of the reference.

Zasa does not disclose or suggest "randomly selecting a seed word from the author analysis model" and "completing a poem following the seed word". Zasa does not disclose or suggest using a seed word much less randomly selecting a seed word. The Examiner has forced an interpretation of a seed word by arbitrarily designating the first word generated by Zasa as a seed word. There is no basis for the Examiner's interpretation in Zasa. Zasa does describe a seed word whatsoever.

Furthermore, Gavron does not disclose or suggest "randomly selecting a seed word from the author analysis model" and "completing a poem following the seed word". Gavron describes an operating system not poetry generation. Gavron does not disclose or suggest using a seed word much less randomly selecting a seed word.

Applicants submit that Zasa and Gavron combined neither describe nor suggest the claimed invention and moreover are not an enabling disclosure. One skilled in the art would not be able to construct Zasa's haiku generator based on a mere two sentences much less be able to construct the Applicant's poetry generator.

Furthermore, Applicants note that there has not been a clear showing, from the prior art, or the examiner's line of reasoning of a motivation to combine the features from the references to provide the claimed invention.

Applicant : Kurzweil, et al.
Serial No. : 09/703,828
Filed : November 1, 2000
Page : 11 of 12

Attorney's Docket No.: 11327-008001

Further, dependent claims add additional distinctive features.

For instance, claim 5 adds the element of selecting an interface that includes a screen saver interface option to open a dialogue box having an option to provide a link to a dialogue box having information on upgrading.

In another instance, claim 13 includes analyzing at least one pre-existing composition to generate linked data structures and generating a new composition from the data structures by using the data structures to locate a user input word in the linked data structure and determine words that follow it in linked data structure. Furthermore, claim 14 further defines the linked data structures to include include 1-grams, bigrams, trigrams, and quadrigrams.

In another instance, claim 15 adds the element of automatically composing words of text while examining weights represented in the linked data structures to avoid counts of words in the linked data structure that would tend to repeat identical words from pre-existing compositions given a start word in an analyzed composition to avoid plagiarism.

For at least the foregoing reasons, Applicant requests withdrawal of the art rejection.

In view of the foregoing amendments and remarks, Applicants submit that the entire application is now in condition for allowance. Such action is respectfully requested at the Examiner's earliest convenience.

All correspondence should be directed to the below address. Applicants' attorney can be reached by telephone at the number shown below.

Applicant : Kurzweil, et al.
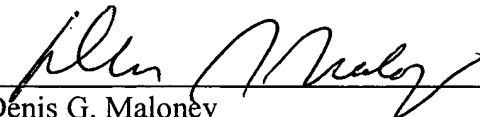Serial No. : 09/703,828
Filed : November 1, 2000
Page : 12 of 12

Attorney's Docket No.: 11327-008001

Enclosed is a check for $55 for the One-Month Extension of Time. No other fee is believed to be due for this Response; however, if any fees are due, please apply such fees to Deposit Account No. 06-1050 referencing Attorney Docket 11327-008001.

Respectfully submitted,

Date: 8/25/03

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